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**AUTOMOBILES—NON-REGISTRATION—EFFECT ON RIGHTS IN CIVIL ACTION.**—The plaintiff was injured by the defendant's negligence while a passenger in an automobile which was not legally registered; under a statute providing that "no motor vehicle . . . shall be operated . . . upon any highway . . . unless registered as provided in this chapter," and imposing a penalty for violation of the provision. Me. Rev. Stat. 1916, c. 26, §§28, 33. *Held*, such non-registration was no bar to recovery in a common-law action for negligence. *Cobb v. Cumberland County Power &c. Co.* (Me. 1918) 104 Atl. 844.

State statutes generally prescribe affirmatively registration of motor vehicles, making non-registration a misdemeanor. N. Y. Laws of 1910, c. 374, §§282, 283, 290; R. I. Pub. L., c. 1354, §§3, 13, 28; Minn. Gen. Stat. 1913, §§2620, 2626, 2645. Under these Statutes, the courts apply the general principle that collateral violation of a statute not proximately contributing to the injury is no bar to a civil recovery. *Hyde v. McCreery* (1911) 145 App. Div. 729, 130 N. Y. Supp. 269; *Marquis v. Messier* (1917) 39 R. I. 563, 99 Atl. 527; *Armstead v. Lounsberry* (1915) 129 Minn. 34, 151 N. W. 542; 1 Shearman & Redf., *Negligence* (6th ed.) §104. The Massachusetts Statute, Acts 1909, c. 534, §9, which adds to the affirmative provision a prohibitive clause like that of Maine, has received a different interpretation. An unregistered vehicle is said to be outlawed, to be a trespasser on the highway; *Dudley v. Northampton St. Ry.* (1909) 202 Mass. 443, 89 N. E. 25; the mere running of the vehicle is a violation of the law which directly caused the injury, *Holden v. McGillicuddy* (1913) 215 Mass. 563, 102 N. E. 923; *Knight v. Savannah Electric Co.* (Ga. App. 1917) 93 S. E. 17, *accord*. But *cf. Bourne v. Whitman* (1911) 209 Mass. 169, 95 N. E. 404. The basis of this theory is sometimes said to be in the prohibitive clause, *Hemming v. City of New Haven* (1910) 82 Conn. 661, 74 Atl. 892, but similar statutory wording has received a contrary construction. Va. Acts of 1910 c. 326 §1; *Southern Ry. v. Vaughan* (1916) 118 Va. 692, 88 S. E. 305. The purpose of a licensing act is viewed by the courts on the one hand as merely to provide revenue, see *Atlantic Coast Line R. R. v. Weir* (1912) 63 Fla. 69, 58 So. 641, or else to regulate the rights of travelers among themselves, *Dudley v. Northampton St. Ry.*, *supra*, and to protect pedestrians, *Knight v. Savannah Electric Co.*, *supra*. It is difficult to see how the registration of a motor vehicle, which involves no test of fitness like the licensing of an operator, can effect the purposes last set forth; or create duties to private individuals beyond a public duty to be enforced by the imposition of the penalties prescribed in the ordinary administration of the criminal law. *Shimoda v. Bundy* (1914) 24 Cal. App. 675, 142 Pac. 109; *Hyde v. McCreery*, *supra*; 2 Elliott, *Roads & Streets* (3rd ed.) §1115. Where the legislature desires to deprive the plaintiff of civil rights, it will do so specifically. Conn. Rev. Stat. 1918, §1565; *Stroud v. Water Commissioners* (1916) 90 Conn. 412, 97 Atl. 336. The instant case, even in view of the Maine Statute, seems sound and is in accord with the weight of authority.